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18 Experian Information Solutions, Inc.

19 Additional counsel listed on signature page

20 UNITED STATES DISTRICT COURT  
21 SOUTHERN DISTRICT OF CALIFORNIA

22 KELLY KLINE; AND REBECCA  
23 KLINE, individually and on behalf of  
24 all others similarly situated,

25 Plaintiff,

26 v.

27 EXPERIAN INFORMATION  
28 SOLUTIONS, INC.,

Defendant.

Case No. 15-CV-436 H (RBB)

**JOINT MOTION FOR  
EXTENSION OF TIME FOR  
DEFENDANT EXPERIAN  
SOLUTIONS, INC. TO  
RESPOND TO PLAINTIFFS'  
COMPLAINT**

1 Plaintiffs Kelly Kline and Rebecca Kline (“Plaintiffs”) and Defendant  
2 Experian Information Solutions, Inc. (“Experian”), through their respective counsel  
3 of record, hereby jointly move pursuant to Civil Local Rules 7.2 and 12.1 for an  
4 Order extending by two weeks the time for Experian to respond to Plaintiffs’  
5 Complaint, for good cause shown, as follows:

6 1. Plaintiffs have filed a putative class action complaint against Experian,  
7 asserting claims for alleged violations of the Fair Credit Reporting Act, 15 U.S.C.  
8 § 1681 et seq. (Doc. No. 1.)

9 2. Experian was served with a summons and a copy of Plaintiffs’  
10 complaint on March 6, 2015. Accordingly, Experian’s current deadline to respond  
11 to the complaint is March 27, 2015.

12 3. Experian and its counsel are investigating Plaintiffs’ allegations. To  
13 allow Experian and its counsel adequate time to investigate Plaintiffs’ claims and  
14 determine an appropriate response, Experian and Plaintiffs agree and stipulate, and  
15 hereby move the Court to order for good cause shown, a two week (14 day)  
16 extension of Experian’s current deadline, making Experian’s response to Plaintiffs’  
17 complaint due on or before **April 10, 2015**.

18 4. This is the first extension of time requested by the parties with respect  
19 to Experian. This extension is not sought for any unnecessary or improper purpose.

20 5. A Proposed Order is lodged concurrently with this Joint Motion.

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1           WHEREFORE, Experian and Plaintiffs jointly request that the Court enter an  
2 Order extending Experian's deadline to respond to Plaintiffs' complaint up to and  
3 including April 10, 2015.

4           IT IS SO STIPULATED.

5       Dated:       March 25, 2015

Respectfully submitted,  
6 JONES DAY  
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8                               By: /s/ Kelly V. O'Donnell  
9                               Kelly V. O'Donnell

10                              Counsel for Defendant  
11                              EXPERIAN INFORMATION  
12                              SOLUTIONS, INC.

Email: kodonnell@jonesday.com

13       Dated:       March 25, 2015

Respectfully submitted,

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15  
16                              By: /s/ Matthew Michael Loker  
17                              Matthew Michael Loker

18                              Counsel for Plaintiffs  
19                              KELLY KLINE AND REBECCA  
20                              KLINE

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**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Matthew Loker, counsel for Plaintiffs, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: March 25, 2015

Respectfully submitted,

JONES DAY

By: /s/ Kelly V. O'Donnell

Kelly V. O'Donnell

Counsel for Defendant  
EXPERIAN INFORMATION  
SOLUTIONS, INC.

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